## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 20-20487 -GLT	
Jamiee L DeSimone	:		
Debtor	:	Chapter 13	
Rushmore Servicing as servicer for U.S. Bank National Association, not in its individual capacity bu	: :t :	Related to Document No. n/a	
Solely as Trustee for RMTP Trust, Series 2021	: :	Hearing Date and Time: July 17, 2024 at 1:	30 pm
Cottage-TT-V	:	5	
Movant	:		
	:		
V.	:		
- 1	:		
Jamiee L DeSimone	:		
Justin F. DeSimone- Co-Debtor	:		
Ronda J. Winnecour- Trustee	:		

# NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND RELIEF FROM CO-DEBTOR STAY

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than <a href="Ully 8, 2024">July 8, 2024</a>, in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at www.pawb.uscourts.gov. If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

You should take this Notice and the Motion to a lawyer at once.

Respondent (if none, then "No Respondent")

An in-person hearing will be held on July 17, \_\_\_\_\_\_, 20\_2, at \_\_\_\_\_1: 30\_\_\_p\_.m. before Judge Gregory L. Taddonio in Courtroom A, 54th Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA, 15219. In accordance with Judge Taddonio's procedures, parties may appear for non-evidentiary

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matter remotely using the Zoom video conference platform. Parties seeking to appear remotely must

register for the hearing by submitting a registration form via the link published on Judge Taddonio's

website (which can be found at https://www.pawb.uscourts.gov/judge-taddonios-video-conference-

hearing-information) by no later than 4 p.m. on the business day prior to the scheduled hearing. All

parties participating remotely shall comply with Judge Taddonio's General Procedures, (which can be

found at http://www.pawb.uscourts.gov/sites/default/files/pdfs/glt-proc.pdf).

Parties who fail to timely register for remote participation will be expected to attend the

hearing in person.

Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be

heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Dated: June 21, 2024

By: \_/s/Lauren M. Moyer Lauren M. Moyer, Esquire FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, New York 11530 T: (212) 471-5100

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TO:

**Trustee**Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

#### **Debtor's Counsel**

Christian M Rieger, Esquire Law Office of Christian M. Rieger 2403 Sidney Street Suite 214 Pittsburgh, PA 15203

## **U.S. Trustee**

Office of the United States Trustee 1000 Liberty Avenue Suite 1316 Pittsburgh, PA 15222

#### **Debtor**

Jamiee L DeSimone 371 Greene Drive Clairton, PA 15025

## **Co-Debtor**

Justin F. DeSimone 371 Greene Drive Jefferson Hills, PA 15025